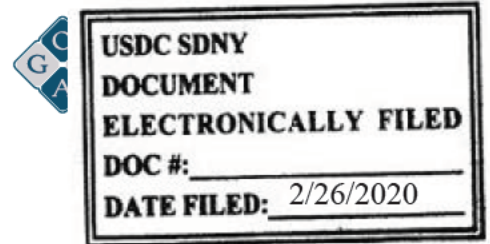


February 25, 2020



VIA ECF AND EMAIL

Honorable Analisa Torres
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Pro Music Rights, LLC v. SoundCloud Limited et al.*, 1:19-cv-11617-AT,
United States District Court for the Southern District of New York

Dear Judge Torres:

This firm represents the plaintiff Pro Music Rights, LLC in the above-referenced action.

In accordance with Sections I.B, I.C. and II.B of Your Honor's Individual Practices in Civil Cases, we write to request an adjournment of the initial pre-trial conference presently scheduled for March 3, 2020, along with an extension by which to file the parties' joint letter and proposed case management plan.

Defendant SoundCloud Inc. has executed a Waiver of the Service of Summons pursuant to which it must file and serve an answer or motion under Rule 12 by March 23, 2020. Additionally, plaintiff has consented to a sixty-day extension of time thereto, such that defendant's response will be filed by May 23, 2020.

Thus, plaintiff respectfully requests an adjournment of the initial pretrial conference for a period of thirty-five (35) days until April 7, 2020, and an extension to file the parties' proposed case management plan by March 31, 2020. Undersigned counsel notes he has a conference before (i) Chief Judge McMahon on April 3 at 10:15 a.m., (ii) Judge Koeltl on April 6 at 4:30 p.m., and (iii) Judge Woods on April 9 at 3:30 p.m. Andrew P. Bridges of Fenwick & West LLP, counsel for SoundCloud, Inc., has a speaking commitment at the ABA Intellectual Property Section Annual Meeting on April 3.

GRANTED in part, DENIED in part. The initial pretrial conference scheduled for March 3, 2020 is ADJOURNED to **April 1, 2020, at 3:50 p.m.** By **March 25, 2020**, the parties shall submit their joint letter and proposed case management plan.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Richard S. Gora".

Richard S. Gora

SO ORDERED.

Dated: February 26, 2020
New York, New York

A handwritten signature in black ink, appearing to read "Analisa Torres".

ANALISA TORRES
United States District Judge